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**BY HAND DELIVERY**

Magalie Salas, Esq.

Secretary

Federal Communications Commission

445 12th Street SW, Room TW-B204

Washington DC 20554

**Re: Amendment of Part 18 of the Commission's Rules to  
 Update Regulations for RF Lighting Devices,  
 ET Docket No. 98-42 + Ex Parte Communication**

Dear Ms. Salas:

This letter responds to the letter from Terry G. Mahn, counsel for Fusion Lighting, to Julius P. Knapp filed in this docket on December 9, 1999 ("Mahn Letter"). I am authorized to state that the following entities support this response: Bluetooth Promoters, Clearwire Technologies, Inc., Intersil Corporation (formerly Harris Corporation — Semiconductor Division), Metricom, Inc., Symbol Technologies, Inc., and 3Com Corporation — collectively, the "Part 15 Interests."

At a meeting Mr. Mahn attended on December 1, addressing matters outside this docket, some manufacturers mentioned ways of hardening spread spectrum systems against certain types of interference. Mr. Mahn subsequently asked those manufacturers to disclose the details of their technologies. Mr. Mahn calls their refusal a "disturbing development[]," and is "outraged" that they would deny the requested information to the public.<sup>1</sup>

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Mahn Letter at 1.

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Magalie Salas, Esq.  
December 22, 1999  
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There is no technology that “overcome[s] ISM interference” to spread spectrum receivers, as Mr. Mahn suggests.<sup>2</sup> To be sure, there are several ways to reduce (but not eliminate) the adverse effects of particular kinds of interference under particular circumstances. More important, direct sequence and frequency hopping systems that comply with Section 15.247 of the Commission's Rules are generally less sensitive to interference than narrowband receivers operating at comparable data rates. In some cases, compliant direct sequence and frequency hopping systems can be further hardened against limited levels of interference, but only to the extent that the emission characteristics of the interference are known in advance. All such measures vary in their effectiveness according to the nature, strength, and predictability of the interfering signal, and they all come at a cost. Sometimes the cost is substantial, and sometimes prohibitive. A prudent spread spectrum manufacturer builds in as much interference protection as is technically and economically feasible. If there were an inexpensive fix that worked against all types and strengths of interference, the spread spectrum community would use it. But no such technology exists.<sup>3</sup>

Mr. Mahn complains that he is “stymied” in his efforts to provide technical information to the Commission. Based on our evolving understanding of the RF lighting industry's needs, the Part 15 Interests have set forth, explained, and defended a succession of specific technical proposals to resolve this proceeding. Our current proposal was filed on June 21, 1999. Mr. Mahn and his clients have yet to provide a technical response, or to offer a proposal of their own. Any stymie is of Mr. Mahn's own making.

Finally, Mr. Mahn persists in using the term “Bluetooth” in apparent reference to the Part 15 spread spectrum industry generally. We objected to this practice in a letter sent to Mr. Mahn and filed with the Commission on April 20, 1999. Bluetooth is only one component of the spread spectrum industry, and does not speak for other entities. The companies listed above refer to themselves collectively as the “Part 15 Interests,” and request that Mr. Mahn do the same. Moreover, Bluetooth is an industry group consisting of many entities involved in the telecommunications and computing industries. The Bluetooth specifications are public documents and do not contain any proprietary technology. In short, Mr. Mahn's remarks concerning Bluetooth are misdirected.

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<sup>2</sup> *Id.*

<sup>3</sup> Even if such a technology did exist, of course, a manufacturer would be under no legal compulsion to disclose proprietary details to the public.

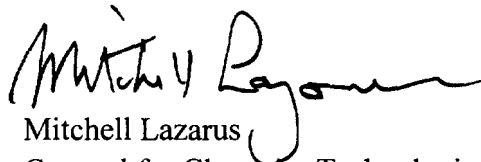
Magalie Salas, Esq.  
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Pursuant to Section 1.1206(b)(1) of the Commission's Rules, I enclose the original and one copy of this letter for inclusion in the above-referenced docket.

Kindly date-stamp and return the extra copy of this letter.

If there are any questions about this filing, please call me at the number above.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Mitchell Lazarus". The signature is fluid and cursive, with the first name "Mitchell" and last name "Lazarus" clearly distinguishable.

Mitchell Lazarus  
Counsel for Clearwire Technologies, Inc.,  
Intersil Corporation, Symbol Technologies, Inc.,  
and 3Com Corporation, and filing as an  
accommodation to Bluetooth Promoters and  
Metricom, Inc.

ML:deb

cc: David Chauncey, Clearwire Technologies, Inc.  
Thomas Daley, Esquire, Clearwire Technologies, Inc.  
David Jatlow, Esquire, Counsel for Bluetooth Promoters  
Ray Martino, Symbol Technologies, Inc.  
Carlos Rios, 3Com Corporation  
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